DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISCION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

NOTICE BY UNITED PARCEL SERVICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION OF UNITED STATES POSTAL SERVICE WITNESS CRUM (USPS-T-28)

(October 6, 1997)

United Parcel Service hereby gives notice of its intent to conduct oral cross-examination of United States Postal Service witness Charles L. Crum (USPS-T-28) on the following subjects: mail processing and other non-transportation cost avoidance estimates for Destination Bulk Mail Center mail, with particular reference to comparing Mr. Crum's methodology with prior methodology; cost avoidance estimates for mail processing and other non-transportation costs for DSCF Parcel Post, including the procedures followed by Postal Service personnel in accepting and other non-transportation cost avoidances for proposed DDU Parcel Post mail, including procedures followed by Postal Service personnel in accepting and processing such

mail; the reliability of Mr. Crum's estimates of avoided costs for Parcel Post; and appropriate pass-throughs of estimated Parcel Post cost savings.

Respectfully submitted,

John E. McKeever Albert P. Parker, II Stephanie Richman

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Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

John F McKeever

Dated: October 6, 1997

Philadelphia, PA